

SUPPORTING DOCUMENT No. 2

Excerpts from Order No. R9-2004-001

Section E, SWMP Requirements
Section K, Watershed-Based Activity Requirements
Attachment D, Individual SWMP Contents

A document presented to the Regional Board on October 12, 2005.

E. STORM WATER MANAGEMENT PLAN (SWMP)

1. Within 365 days from the date of this Order, the Principal Permittee shall submit a SWMP to the SDRWQCB. The SWMP shall describe the various urban runoff management programs that will be implemented to comply with this Order and to reduce pollutants in urban runoff to the MEP for the duration of this Order. The SWMP is an integral and enforceable component of this Order and shall consist of the following:
 - a) Individual SWMP - The written description of each Permittee's individual programs that address Sections B through J of this Order. **Attachment D** contains direction for the preparation of the Individual SWMP. Each Permittee shall submit their Individual SWMP to the Principal Permittee by a date determined by the Principal Permittee for inclusion in the SWMP.
 - b) Watershed SWMP - The written account of all area-wide and watershed-based programs and activities conducted by the Permittees. The Watershed SWMP shall contain the programs and items required above in Requirements K.1 – K.4 of this Order.
2. Unless otherwise specified, within 365 days of the adoption of this Order, each Permittee shall have completed full implementation of the SWMP and all requirements in this Order. Prior to the implementation of new or revised programs, each Permittee shall, at a minimum, continue implementation of existing programs developed pursuant to Order No. R9-98-02 and described in the 2002-2003 Annual Progress Report.
3. Each Permittee shall incorporate a mechanism for public participation during the development and implementation of its SWMP.

ATTACHMENT D

INDIVIDUAL SWMP CONTENTS

Pursuant to Requirement E.1.a. of tentative Order No. R9-2004-001, each Permittee shall develop an Individual SWMP that describes their specific urban runoff management programs and activities that will be implemented to comply with the Order. An individual SWMP that addresses the items listed below would provide a complete description of the programs and activities the Permittee plans to implement to comply with the Order and to reduce pollutants in urban runoff to the MEP. In the event that a specific component is not applicable to a Permittee, the Permittee shall provide an explanation of non-applicable programs with the SWMP submittal and does not need to provide the information requested below in that particular section of their Individual SWMP.

1. Administrative and Legal Procedures

- a) Identification of all departments within the jurisdiction that conduct urban runoff related activities, and their roles and responsibilities under the Order. Include an up-to-date organizational chart specifying these departments and key personnel;
- b) Citation of urban runoff related ordinances and the reasons they are enforceable;
- c) Identification of the local administrative and legal procedures available to mandate compliance with urban runoff related ordinances and therefore with the conditions of the Order;
- d) Description of how these ordinances are implemented and appealed; and
- e) Description of whether the Permittee can issue administrative orders and injunctions or if it must go through the court system for enforcement actions.

2. Development Planning (Section F)

- a) A description of the water quality and watershed protection principles that have been or will be included in the Permittee's General plan, and a time schedule where modifications are planned, if applicable;
- b) A description of the development project approval process and how it ensures that urban runoff from new development and redevelopment will be reduced to the MEP, that post-development runoff volumes and velocities will be controlled, and that water quality objectives will not be violated throughout the life of the project;
- c) A final SUSMP document that meets the requirements specified in Section F.2.b. of the Order, and a copy of the ordinance (amended or new) that gives the Permittee the authority to implement and enforce the SUSMP. The SUSMP may be submitted under separate cover as an attachment to the SWMP;
- d) A description of the Permittee's current environmental review process and how it addresses impacts to water quality and appropriate mitigation measures. If the Permittee plans to modify the process during the permit term, a time schedule for modifications shall be included;
- e) A description of education efforts related to development and how they will be implemented; and
- f) A description of the measurable goals that will be used to assess the effectiveness of this program component.

3. Construction Component (Section G)

- a) A description of which pollution prevention methods will be required for implementation, and the steps that will be taken to ensure implementation;
- b) Updated grading ordinances, including adequate enforcement mechanisms;
- c) A description of the modified construction and grading approval process;
- d) Updated construction and grading project requirements in local grading and construction permits;
- e) A completed inventory of all construction sites;
- f) A list and description of minimum BMPs that will be implemented, or required to be implemented;
- g) A description of the steps that will be taken to ensure the implementation of prescribed BMPs at all construction sites;
- h) A description of planned inspection frequencies;
- i) A description of inspection procedures;
- j) A description of enforcement mechanisms and steps that will be used;
- k) A description of the construction education program and how it will be implemented; and
- l) A description of the measurable goals that will be used to assess the effectiveness of this program component.

4. Municipal Component (Section H.1)

- a) A description of which pollution prevention methods will be required for implementation, and the steps taken to ensure implementation;
- b) A completed inventory of all municipal facilities and activities;
- c) A description of which BMPs will be implemented, or required to be implemented, for municipal facilities and activities;
- d) A description of steps that will be taken to ensure the implementation of prescribed BMPs at municipal facilities and activities;
- e) A description of municipal maintenance activities and schedules;
- f) A description of the management strategy for pesticides, herbicides, and fertilizer use;
- g) A description of inspection procedures;
- h) A description of enforcement mechanisms and how they will be used; and
- i) A description of the measurable goals that will be used to assess the effectiveness of this program component.

5. Industrial/Commercial Facilities Component (Section H.2)

- a) A description of which pollution prevention methods will be required for implementation, and the steps that will be taken to ensure implementation;
- b) A completed and prioritized inventory of all industrial/commercial facilities that could contribute a significant pollutant load to the MS4;
- c) A list of minimum BMPs that will be implemented, or required to be implemented, for each facility type or pollutant-generating activity;

- d) A description of the steps that will be taken to ensure the implementation of prescribed BMPs at industrial/commercial facilities, including notification procedures;
- e) A description of inspection procedures;
- f) A description of enforcement mechanisms and how they will be used;
- g) A description of training efforts; and
- h) A description of the measurable goals that will be used to assess the effectiveness of this program component.

6. Residential Component (Section H.3)

- a) A description of which pollution prevention methods will be encouraged for implementation, and the steps that will be taken to encourage implementation;
- b) A list of residential activities that have been identified as high priority;
- c) A list of minimum BMPs that will be implemented, or required to be implemented, for high priority residential activities;
- d) A description of the steps that will be taken to ensure the implementation of prescribed BMPs for high priority residential activities;
- e) A description of enforcement mechanisms and how they will be used; and
- f) A description of the measurable goals that will be used to assess the effectiveness of this program component.

7. Education Component (Section I)

- a) A description of the content, form, and frequency of education efforts for each target community; and
- b) A description of the measurable goals that will be used to assess the effectiveness of the public education program.

8. Illicit Discharge Detection and Elimination Component (Section J)

- a) A description of the program to actively seek and eliminate illicit discharges and illicit connections;
- b) An Illicit Discharge Monitoring Program, in accordance with the Monitoring and Reporting Program, to be conducted to detect illicit discharges and illicit connections;
- c) A description of investigation and inspection procedures to follow up on dry weather monitoring results or other information which indicate potential for illicit discharges and illicit connections;
- d) A description of procedures to promptly eliminate detected illicit discharges and illicit connections;
- e) A description of enforcement mechanisms and how they will be used;
- f) A description of the mechanism to receive notification of spills;
- g) A description of efforts to facilitate public reporting of illicit discharges and connections, including a public hotline;
- h) A description of efforts to facilitate proper disposal of used oil and other toxic materials; and

- i) A description of measurable goals that will be used to assess the effectiveness of this program component.

9. Public Participation Component (Section E.3)

A description of how public participation will be included in the development and implementation of each Permittee's Individual SWMP.

10. Assessment of Individual SWMP Effectiveness Component

As part of its Individual SWMP, each Permittee shall develop a long-term strategy for assessing the effectiveness of its Individual SWMP. The long-term assessment strategy shall, at a minimum, include the following:

- a) An assessment of the progress towards meeting the measurable goals identified in each program component;
- b) An assessment of Illicit Discharge and Receiving Water monitoring data; and
- c) An assessment of overall program effectiveness.

11. Fiscal Analysis Component

Each Permittee shall secure the resources necessary to meet the requirements of the Order. As part of its Individual SWMP, each Permittee shall describe and analyze the capital and operation and maintenance expenditures necessary to accomplish the activities required in the Order, and a description of the source of funds the Permittee proposes to use to meet those expenditures.

12. Fire Fighting

A description of a program to reduce pollutants from non-emergency fire fighting flows identified by the Permittee to be significant sources of pollutants.

K. WATERSHED-BASED ACTIVITIES

1. Each Permittee shall collaborate with other Permittees to identify, address, and mitigate the highest priority water quality issues/pollutants in the Upper Santa Margarita Watershed.
2. Each Permittee shall collaborate with all other Permittees to develop and implement a Watershed SWMP for the Upper Santa Margarita Watershed. The Watershed SWMP shall, at a minimum, contain the following:
 - a) An accurate map of the Upper Santa Margarita Watershed (preferably in GIS format) that identifies all receiving waters, all CWA section 303(d) impaired receiving waters, existing and planned land uses, MS4s, major highways, jurisdictional boundaries, and industrial and commercial facilities, municipal sites, and residential areas.
 - b) A description of any interagency agreement, or other efforts, with non-Permittee owners of the MS4 (such as Caltrans, Native American Tribes, and school districts) to control the contribution of pollutants from one portion of the shared MS4 to another portion of the shared MS4;
 - c) An assessment of the water quality of all receiving waters in the watershed based upon (1) existing water quality data; and (2) results from the Receiving Waters and Illicit Discharge Monitoring Programs described in the MRP;
 - d) An identification and prioritization of major water quality problems in the watershed caused or contributed to by MS4 discharges and the likely source(s) of the problem(s);
 - e) An implementation time schedule of short and long-term recommended activities (individual and collective) needed to address the highest priority water quality problem(s) identified in Requirement K.2.d. above. For this section, "short-term activities" shall mean those activities that are to be completed during the life of this Order and "long-term activities" shall mean those activities that are to be completed beyond the life of this Order;
 - f) A watershed-based education program, which focuses on water quality issues specific to the Santa Margarita watershed;
 - g) A mechanism to facilitate collaborative "watershed-based" (i.e., natural resource-based) land use planning with neighboring local governments in the watershed.
 - h) A description of any other urban runoff management programs or activities being conducted collectively by the Permittees to address water quality issues;
 - i) A description of Permittee responsibilities for implementing the programs described in the Watershed SWMP;
 - j) The expenditures and funding sources for the area-wide and watershed-based activities and programs;

- k) Standardized reporting formats developed collectively by the Permittees, as specified in Requirement M.1;
 - l) Short-term strategy for assessing the effectiveness of the activities and programs implemented as part of the Watershed SWMP. The short-term assessment strategy shall identify methods to assess program effectiveness and include specific direct and indirect performance measurements that will track the immediate progress and accomplishments of the Watershed SWMP towards improving receiving water quality impacted by urban runoff discharges. The short-term strategy shall also discuss the role of monitoring data collected by the Permittees in substantiating or refining the assessment; and
 - m) Long-term strategy for assessing the effectiveness of the Watershed SWMP. The long-term assessment strategy shall identify specific direct and indirect performance measurements that will track the long-term progress of the Watershed SWMP towards achieving improvements in receiving water quality impacted by urban runoff discharges. Methods used for assessing effectiveness shall include the following or their equivalent: surveys, pollutant loading estimations, receiving water quality monitoring, and achievement of measurable goals. The long-term strategy shall also discuss the role of monitoring data in substantiating or refining the assessment.
- 3. Permittees shall, as appropriate, participate in watershed management efforts to address storm water quality issues within the entire Santa Margarita Watershed, including efforts conducted by other entities in the watershed, such as San Diego County, U.S. Marine Corps Base Camp Pendleton, Native American tribes, and other state, federal, and local agencies.
 - 4. At least once a year, all Permittees shall meet to review and assess available water quality data (from the MRP and other reliable sources), assess program effectiveness, and to review and update the Watershed SWMP.

SUPPORTING DOCUMENT No. 3

**Letters to Permittees
Regarding SWMP Submittals**

A document presented to the Regional Board on October 12, 2005.



California Regional Water Quality Control Board

San Diego Region

Alan C. Lloyd, Ph.D.
Secretary for
Environmental
Protection

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Arnold Schwarzenegger
Governor

Certified Mail No. 70051160000460266567

September 28, 2005

Steve Mandoki, City Manager
City of Murrieta
26442 Beckman Court
Murrieta, CA 92562

In reply refer to:
WPN: 10-7006.02:becke

Dear Mr. Mandoki:

SUBJECT: REVIEW OF STORM WATER MANAGEMENT PLAN (SWMP) FOR THE CITY OF MURRIETA, SANTA MARGARITA WATERSHED

We have reviewed your Individual SWMP entitled *City of Murrieta Stormwater Management Plan* and the *Riverside County Drainage Area Management Plan* dated July 2005. As stated in the MS4 permit (Order No. R9-2004-001), the purpose of the Individual SWMP document is to provide a written account of the overall program to be conducted by the City during the five-year life of the Order. The Order further specifies that the Individual SWMP document describe all activities that the City has taken or is planning to take to implement the requirements contained in Sections B through J of the Order. Order No. R9-2004-001 also requires the submittal of a Watershed SWMP, which is the written account of all area-wide and watershed-wide programs and activities conducted collectively by the Permittees. The Order states that the Watershed SWMP shall contain the programs and items required in Section K of the Order.

Subsequent to the receipt of the SWMP, we met with the Permittees to discuss the results of our initial review. This discussion clarified several issues and, in turn, enhanced our understanding of the intent of the material presented in the documents. Consequently, we have only identified in this letter the major omissions or deficiencies in the SWMP and the Drainage Area Management Plan (DAMP) documents that potentially are violations of Order No. R9-2004-001. If not corrected in a timely manner, these omissions or deficiencies could lead to enforcement action by the Regional Board. I, therefore, request that the City submit a report by November 7, 2005 addressing these items. The report should document the needed modifications made in its Individual and/or Watershed SWMP and/or propose a time schedule for making necessary future modifications to achieve full compliance with Order No. R9-2004-001.

1. WATERSHED SWMP REQUIREMENTS (PERMIT SECTION K)

Section E.1.b. of the Order requires that the Permittees collaborate to develop a Watershed SWMP, which is the written account of all area-wide and watershed-based programs and activities conducted by the Permittees. The Order states that the Watershed SWMP shall contain the programs and items required in Section K of the Order. These requirements

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at <http://www.swrcb.ca.gov>.

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should be specifically addressed in either a Watershed SWMP document or a Watershed section of the DAMP.

Deficiencies in the DAMP include:

- a. The DAMP does not adequately describe how the Permittees collaborated to identify, address, and mitigate the highest priority water quality issues/pollutants in the Upper Santa Margarita Watershed (Requirement K.1).
- b. The DAMP does not contain an assessment of water quality of all receiving waters in the watershed (Requirement K.2.c).
- c. The DAMP fails to identify and prioritize major water quality problems in the watershed caused or contributed to by MS4 discharges and the likely sources of the problems (Requirement K.2.d).
- d. The DAMP does not include an implementation time schedule of short and long-term recommended activities needed to address the highest priority water quality problem(s) identified in Requirement K.2.d (Requirement K.2.e).
- e. The DAMP does not include a mechanism to facilitate collaborative "watershed-based" land use planning with neighboring local governments in the watershed (Requirement K.2.g). San Diego County's effort to develop a watershed management plan is no longer occurring.
- f. The DAMP does not include a short or long term strategy specifically addressing the effectiveness of the Watershed SWMP (Requirements K.2.l and K.2.m).

If an assessment of all available water quality data does not allow the Permittees to identify a priority water quality problem(s), the Permittees shall focus their Watershed SWMP activities on a potential priority problem(s) resulting from rapid urbanization of the upper watershed. The Watershed SWMP must contain commitments to address these identified existing or potential issues to the maximum extent practicable. Attachment 1 contains examples of commitments that could be included in a Watershed SWMP to address existing or potential priority water quality problems.

2. GRADING ORDINANCE UPDATE (PERMIT SECTION G.2)

Section G.2 requires the City to review and update its grading ordinance for compliance with its storm water ordinances and the Permit within 365 days. The City included a grading ordinance adopted in 1993 that is not in compliance with Permit requirements.

The City has yet to adopt a new grading ordinance to incorporate the Permit requirements.

3. CONSTRUCTION BMP REQUIREMENTS (PERMIT SECTION G.5)

Section G.5 requires the City to designate and require minimum BMPs at all construction sites within its jurisdiction.

The City's SWMP does not contain minimum BMPs that will be enforced at these construction sites. A list of construction BMPs is provided in the DAMP, but the SWMP does not indicate that these are the minimum BMPs that are required.

4. SOURCE IDENTIFICATION & INSPECTION (PERMIT SECTIONS G.4 & G.6)

The Permit requires the City to provide an inventory of all construction sites to ensure that each site is inspected at the appropriate frequency. Use of the incomplete construction inventory (i.e. no project acreage) in the City's SWMP could result in sites not being inspected at the required frequencies in violation of the Permit. The County of Riverside SWMP can be referenced as an example that includes an effective construction inventory that could be clearly used to schedule and track required inspections.

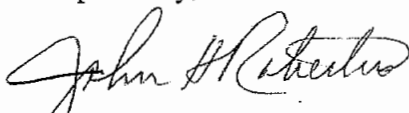
5. DEVELOPMENT PLANNING (PERMIT SECTION F)

Requirement F.2.b(2)(a) of the Permit states that BMPs for Priority Development Projects shall control post-development urban runoff discharge velocities, volumes, durations, and peak rates to maintain or reduce pre-development downstream erosion, and protect stream habitat. The Permit requires the City to ensure all Priority Development Projects implement source control and treatment BMPs to prevent increased erosion downstream. The City's SWMP implements the Model WQMP in the DAMP, which identifies mitigation measures to address hydrologic conditions of concern for priority development projects. A mitigation measure (Methodology A.1) describes construction of a detention basin to maintain peak discharge rates and velocities for 2 & 10-year storm events.

The mitigation measure, however, is inadequate without addressing increased flow duration, which could substantially increase downstream erosion.

We look forward to receiving your report on or before November 7, 2005 and to working with the City of Murrieta to preserve and enhance the quality of water resources for the benefit of present and future generations. If you would like meet with us to discuss the development of your report, or if you have any questions regarding this letter, please contact Megan Quigley at 858-268-5363 or email mquigley@waterboards.ca.gov.

Respectfully,



JOHN H. ROBERTUS
Executive Officer

CC:

Farida Naceem, City of Murrieta

Jason Uhley, Riverside County Flood Control and Water Conservation District

ATTACHMENT 1

Listed below are examples of existing and potential water quality problems that could be a focus of the Watershed SWMP and examples of the types of activities and commitments that can be included to address the selected water quality problems and meet the maximum extent practicable standard, as it is outlined in the requirements of section K of San Diego Regional Water Quality Control Board Order No. 2004-001 (the Riverside County Municipal Storm Water Permit). Activities included in the Watershed SWMP should be in addition to the minimum BMP requirements contained in the individual SWMPs.

Phosphorus

1. Focus education efforts on residents and businesses that use and sell fertilizer and other lawn care products.
2. Collaborate with the water districts in an effort to reduce the use of irrigation water runoff.
3. Focus inspections and increase enforcement at industrial and commercial facilities known to be sources of phosphorus (i.e., dry cleaners, landscape companies, car washes, etc.)
4. Conduct outreach to farmers and other entities in the watershed that may be contributing to the phosphorus impairment.
5. Require/encourage the use of Integrated Pest Management measures.
6. Require/encourage the use of native landscaping in new developments to reduce runoff from irrigation water.
7. Construct wetlands or similar structural treatment best management practices
8. Conduct a source identification study for an identified problem area, such as Murrieta Creek
9. Implement a BMP pilot project in an identified problem area
10. Increase dry weather monitoring for phosphorus in suspected problem areas
11. Coordinate and prioritize water quality projects that address pollutants of concern in the watershed , co-sponsor applications for funding
12. Prioritize drainages in the watersheds where actions should be focused and monitored

13. Conduct meetings among permittees to exchange ideas of how to address sources of pollutants of concern in the watershed and evaluate the effectiveness of actions
14. Conduct annual meetings with San Diego County and other entities in the watershed to discuss monitoring data and potential management measures to target the phosphorus impairment.
15. Identify what types of new projects would have a higher potential for contributing to the watershed problem and identify how the permittees have agreed to mitigate that threat.
16. Establish load reduction goals for each permittee in the watershed.

Sediment/Turbidity (example of potential problem from construction activities)

1. Treat all construction sites that disturb soil within the watershed as high priority construction sites (i.e., increase inspection frequencies).
2. Adopt more stringent BMP requirements for construction sites located in the watershed.
3. Conduct pre-construction meeting at all construction sites, notifying developers and contractors of sediment problems within the watershed.
4. Survey the watershed to identify drainages and other areas that are excessively eroding, then address the excessive erosion.
5. Implement focused education efforts targeting sources of sediment.

Impacts to Hydrologic Function (example of potential problem from new development)

1. Place additional focus on the SUSMP requirements.
2. Minimize impacts to streams and wetlands.
3. Remove concrete from channels and v-ditches.
4. Daylight underground storm water conveyance lines.
5. Preserve pre-development hydrology of sites by requiring Low Impact Development (LID) techniques instead of mitigating the effects with basins and other conventional methods.

6. Conduct a pilot study in an area of new development by requiring LID techniques and monitoring water quality and downstream erosion as compared to a typical development.
7. Meet with San Diego County annually to discuss available monitoring data and potential BMPs to address chemical and physical problems from rapid growth.



California Regional Water Quality Control Board

San Diego Region

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Arnold Schwarzenegger
Governor

September 28, 2005

Shawn Nelson, City Manager
City of Temecula
43200 Business Park Drive
Temecula, CA 92589

Certified Mail No. 70051160000460266611

In reply refer to:
WPN: 10-7005.02:becke

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2. SOURCE IDENTIFICATION & INSPECTION (PERMIT SECTIONS G.4 & G.6)

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3. DEVELOPMENT PLANNING (PERMIT SECTION F)

Requirement F.2.b(2)(a) of the Permit states that BMPs for Priority Development Projects shall control post-development urban runoff discharge velocities, volumes, durations, and peak rates to maintain or reduce pre-development downstream erosion, and protect stream habitat. The Permit requires the City to ensure all Priority Development Projects implement source control and treatment BMPs to prevent increased erosion downstream. The City's SWMP implements the Model WQMP in the DAMP, which identifies mitigation measures to address hydrologic conditions of concern for priority development projects. A mitigation measure (Methodology A.1) describes construction of a detention basin to maintain peak discharge rates and velocities for 2 & 10-year storm events.

The mitigation measure, however, is inadequate without addressing increased flow duration, which could substantially increase downstream erosion.

We look forward to receiving your report on or before November 7, 2005 and to working with the City of Temecula to preserve and enhance the quality of water resources for the benefit of present and future generations. If you would like meet with us to discuss the development of your report, or if you have any questions regarding this letter, please contact Megan Quigley at 858-268-5363 or email mquigley@waterboards.ca.gov.

Respectfully,



JOHN H. ROBERTUS
Executive Officer

CC:

Ron Parks, City of Temecula
Aldo Licitra, City of Temecula
Jason Uhley, Riverside County Flood Control and Water Conservation District

ATTACHMENT 1

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Phosphorus

1. Focus education efforts on residents and businesses that use and sell fertilizer and other lawn care products.
2. Collaborate with the water districts in an effort to reduce the use of irrigation water runoff.
3. Focus inspections and increase enforcement at industrial and commercial facilities known to be sources of phosphorus (i.e., dry cleaners, landscape companies, car washes, etc.)
4. Conduct outreach to farmers and other entities in the watershed that may be contributing to the phosphorus impairment.
5. Require/encourage the use of Integrated Pest Management measures.
6. Require/encourage the use of native landscaping in new developments to reduce runoff from irrigation water.
7. Construct wetlands or similar structural treatment best management practices
8. Conduct a source identification study for an identified problem area, such as Murrieta Creek
9. Implement a BMP pilot project in an identified problem area
10. Increase dry weather monitoring for phosphorus in suspected problem areas
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13. Conduct meetings among permittees to exchange ideas of how to address sources of pollutants of concern in the watershed and evaluate the effectiveness of actions
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15. Identify what types of new projects would have a higher potential for contributing to the watershed problem and identify how the permittees have agreed to mitigate that threat.
16. Establish load reduction goals for each permittee in the watershed.

Sediment/Turbidity (example of potential problem from construction activities)

1. Treat all construction sites that disturb soil within the watershed as high priority construction sites (i.e., increase inspection frequencies).
2. Adopt more stringent BMP requirements for construction sites located in the watershed.
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4. Survey the watershed to identify drainages and other areas that are excessively eroding, then address the excessive erosion.
5. Implement focused education efforts targeting sources of sediment.

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1. Place additional focus on the SUSMP requirements.
2. Minimize impacts to streams and wetlands.
3. Remove concrete from channels and v-ditches.
4. Daylight underground storm water conveyance lines.
5. Preserve pre-development hydrology of sites by requiring Low Impact Development (LID) techniques instead of mitigating the effects with basins and other conventional methods.

6. Conduct a pilot study in an area of new development by requiring LID techniques and monitoring water quality and downstream erosion as compared to a typical development.
7. Meet with San Diego County annually to discuss available monitoring data and potential BMPs to address chemical and physical problems from rapid growth.



California Regional Water Quality Control Board

San Diego Region

Alan C. Lloyd, Ph.D.
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Arnold Schwarzenegger
Governor

Certified Mail No. 70051160000460266598

September 28, 2005

Warren D. Williams, General Manager
Riverside County Flood Control and
Water Conservation District
1995 Market Street
Riverside, CA 92501

In reply refer to:
WPN: 10-7004.02:quigm

Dear Mr. Williams:

**SUBJECT: REVIEW OF STORM WATER MANAGEMENT PLAN (SWMP) FOR THE
COUNTY OF RIVERSIDE, SANTA MARGARITA WATERSHED**

We have reviewed your Individual SWMP entitled *Riverside County Flood Control and Water Conservation District Riverside Santa Margarita Region Stormwater Management Plan* and the *Riverside County Drainage Area Management Plan* dated July 2005. As stated in the MS4 permit (Order No. R9-2004-001), the purpose of the Individual SWMP document is to provide a written account of the overall program to be conducted by the Riverside County Flood Control and Water Conservation District (District) during the five-year life of the Order. The Order further specifies that the Individual SWMP document describe all activities that the District has taken or is planning to take to implement the requirements contained in Sections B through J of the Order. Order No. R9-2004-001 also requires the submittal of a Watershed SWMP, which is the written account of all area-wide and watershed-wide programs and activities conducted collectively by the Permittees. The Order states that the Watershed SWMP shall contain the programs and items required in Section K of the Order.

Subsequent to the receipt of the SWMP and the Drainage Area Management Plan (DAMP), we met with the Permittees to discuss the results of our initial review. This discussion clarified several issues and, in turn, enhanced our understanding of the intent of the material presented in the documents. Consequently, we have only identified in this letter the major omissions or deficiencies in the SWMP and the DAMP documents that potentially are violations of Order No. R9-2004-001. If not corrected in a timely manner, these omissions or deficiencies could lead to enforcement action by the Regional Board. I, therefore, request that the District submit a report by November 7, 2005 addressing these items. The report should document the needed modifications made in its Individual and/or Watershed SWMP and/or propose a time schedule for making necessary future modifications to achieve full compliance with Order No. R9-2004-001.

California Environmental Protection Agency

The energy challenge facing California is real. Every Californian needs to take immediate action to reduce energy consumption. For a list of simple ways you can reduce demand and cut your energy costs, see our Web-site at <http://www.swrcb.ca.gov>.

Recycled Paper



1. WATERSHED SWMP REQUIREMENTS (PERMIT SECTION K)

Section E.1.b. of the Order requires that the Permittees collaborate to develop a Watershed SWMP, which is the written account of all area-wide and watershed-based programs and activities conducted by the Permittees. The Order states that the Watershed SWMP shall contain the programs and items required in Section K of the Order. These requirements should be specifically addressed in either a Watershed SWMP document or a Watershed section of the DAMP.

Deficiencies in the DAMP include:

- a. The DAMP does not adequately describe how the Permittees collaborated to identify, address, and mitigate the highest priority water quality issues/pollutants in the Upper Santa Margarita Watershed (Requirement K.1).
- b. The DAMP does not contain an assessment of water quality of all receiving waters in the watershed (Requirement K.2.c).
- c. The DAMP fails to identify and prioritize major water quality problems in the watershed caused or contributed to by MS4 discharges and the likely sources of the problems (Requirement K.2.d).
- d. The DAMP does not include an implementation time schedule of short and long-term recommended activities needed to address the highest priority water quality problem(s) identified in Requirement K.2.d (Requirement K.2.e).
- e. The DAMP does not include a mechanism to facilitate collaborative "watershed-based" land use planning with neighboring local governments in the watershed (Requirement K.2.g). San Diego County's effort to develop a watershed management plan is no longer occurring.
- f. The DAMP does not include a short or long term strategy specifically addressing the effectiveness of the Watershed SWMP (Requirements K.2.l and K.2.m).

If an assessment of all available water quality data does not allow the Permittees to identify a priority water quality problem(s), the Permittees shall focus their Watershed SWMP activities on a potential priority problem(s) resulting from rapid urbanization of the upper watershed. The Watershed SWMP must contain commitments to address these identified existing or potential issues to the maximum extent practicable. Attachment 1 contains examples of commitments that could be included in a Watershed SWMP to address existing or potential priority water quality problems.

2. CONSTRUCTION BMP REQUIREMENTS (PERMIT SECTION G.5)

Section G.5 requires the District to designate and require minimum BMPs at all construction sites within its jurisdiction.

The District's SWMP does not contain minimum BMPs that will be enforced at these construction sites. A list of construction BMPs is provided in the DAMP, but the SWMP does not indicate that these are the minimum BMPs that are required.

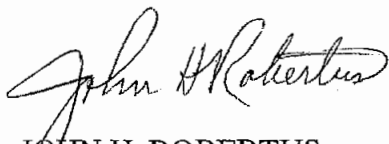
3. DEVELOPMENT PLANNING (PERMIT SECTION F)

Requirement F.2.b(2)(a) of the Permit states that BMPs for Priority Development Projects shall control post-development urban runoff discharge velocities, volumes, durations, and peak rates to maintain or reduce pre-development downstream erosion, and protect stream habitat. The Permit requires the District to ensure all Priority Development Projects implement source control and treatment BMPs to prevent increased erosion downstream. The District's SWMP implements the Model WQMP in the DAMP, which identifies mitigation measures to address hydrologic conditions of concern for priority development projects. A mitigation measure (Methodology A.1) describes construction of a detention basin to maintain peak discharge rates and velocities for 2 & 10-year storm events.

The mitigation measure, however, is inadequate without addressing increased flow duration, which could substantially increase downstream erosion.

We look forward to receiving your report on or before November 7, 2005 and to working with the District to preserve and enhance the quality of water resources for the benefit of present and future generations. If you would like meet with us to discuss the development of your report, or if you have any questions regarding this letter, please contact Megan Quigley at 858-268-5363 or email mquigley@waterboards.ca.gov.

Respectfully,



JOHN H. ROBERTUS
Executive Officer

CC: Jason Uhley, Riverside County Flood Control and Water Conservation District

ATTACHMENT 1

Listed below are examples of existing and potential water quality problems that could be a focus of the Watershed SWMP and examples of the types of activities and commitments that can be included to address the selected water quality problems and meet the maximum extent practicable standard, as it is outlined in the requirements of section K of San Diego Regional Water Quality Control Board Order No. 2004-001 (the Riverside County Municipal Storm Water Permit). Activities included in the Watershed SWMP should be in addition to the minimum BMP requirements contained in the individual SWMPs.

Phosphorus

1. Focus education efforts on residents and businesses that use and sell fertilizer and other lawn care products.
2. Collaborate with the water districts in an effort to reduce the use of irrigation water runoff.
3. Focus inspections and increase enforcement at industrial and commercial facilities known to be sources of phosphorus (i.e., dry cleaners, landscape companies, car washes, etc.)
4. Conduct outreach to farmers and other entities in the watershed that may be contributing to the phosphorus impairment.
5. Require/encourage the use of Integrated Pest Management measures.
6. Require/encourage the use of native landscaping in new developments to reduce runoff from irrigation water.
7. Construct wetlands or similar structural treatment best management practices
8. Conduct a source identification study for an identified problem area, such as Murrieta Creek
9. Implement a BMP pilot project in an identified problem area
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16. Establish load reduction goals for each permittee in the watershed.

Sediment/Turbidity (example of potential problem from construction activities)

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Impacts to Hydrologic Function (example of potential problem from new development)

1. Place additional focus on the SUSMP requirements.
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Arnold Schwarzenegger
Governor

Certified Mail No. 70051160000460266581

September 28, 2005

Ms. Rhonda King, Deputy County CEO
County of Riverside
4080 Lemon Street, 4th Floor
Riverside, CA 92501

In reply refer to:
WPN: 10-7004.02:quigm

Dear Ms. King:

SUBJECT: REVIEW OF STORM WATER MANAGEMENT PLAN (SWMP) FOR THE COUNTY OF RIVERSIDE, SANTA MARGARITA WATERSHED

We have reviewed your Individual SWMP entitled *County of Riverside Santa Margarita Region Stormwater Management Plan* and the *Riverside County Drainage Area Management Plan* dated July 2005. As stated in the MS4 permit (Order No. R9-2004-001), the purpose of the Individual SWMP document is to provide a written account of the overall program to be conducted by the County during the five-year life of the Order. The Order further specifies that the Individual SWMP document describe all activities that the County has taken or is planning to take to implement the requirements contained in Sections B through J of the Order. Order No. R9-2004-001 also requires the submittal of a Watershed SWMP, which is the written account of all area-wide and watershed-wide programs and activities conducted collectively by the Permittees. The Order states that the Watershed SWMP shall contain the programs and items required in Section K of the Order.

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1. INDUSTRIAL/COMMERCIAL FACILITIES PROGRAM (Permit Section H.2)

Requirement H.2.b requires the County to develop an inventory or database of all industrial and commercial facilities under its jurisdiction that could contribute a significant pollutant load to the MS4. Requirement H.2.b. lists facility types that must be included in the inventory.

California Environmental Protection Agency

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The County's SWMP does not include a complete inventory of industrial and commercial facilities. The County identifies only those facilities covered by the Compliance Assistance Program (CAP), which includes facilities covered under Department of Environmental Health permits. The County's SWMP states that, "The County does not have a business database or business license program in order to assist with locating facilities outside of the CAP Program. The County will continue to evaluate other alternatives in order to locate facilities outside of the CAP Program."

Requirement H.2.d requires the County to establish priorities for inspections and oversight of industrial/commercial facilities by prioritizing the inventory required in H.2.b. The Order also requires (H.2.d.2 – 4) the County to inspect and ensure the implementation of minimum BMPs at all inventoried facilities.

The fact that the County has not inventoried all applicable facilities would likely result in not conducting the required inspections.

The purpose of Requirement H.2.b is for the Permittees to be capable of identifying industrial and commercial facilities that must be inspected on a periodic basis. The inspection frequency is determined by the Permittees on an evaluation of the facility's threat to water quality. We understand that the County already has a program in place to inspect all restaurants and facilities with storage or use of hazardous materials. For industrial/commercial facilities that are neither restaurants nor hazardous materials facilities, a commitment by the County to inspect all areas in the unincorporated area that are zoned commercial or industrial in a timely manner would satisfy this requirement. The purpose of these inspections is to identify and prioritize specific facilities or commercial areas for inspection frequencies and BMP requirements.

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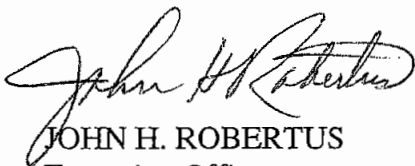
September 28, 2005

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Executive Officer

CC:

Alex Gann, Senior Management Analyst
Riverside County Executive Office

Jason Uhley, Riverside County Flood Control and Water Conservation District

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